

STATE OF COLORADO

Roy Romer, Governor
Patti Shwayder, Executive Director

Dedicated to protecting and improving the health and environment of the people of Colorado

4300 Cherry Creek Dr. S.
Denver, Colorado 80222-1530
Phone (303) 692-2000

Laboratory and Radiation Services Division
8100 Lowry Blvd.
Denver CO 80220-6928
(303) 692-3090

<http://www.cdphe.state.co.us>



Colorado Department
of Public Health
and Environment

2/12 JD
CC:
Kelly
Charlie
Mark

February 6, 1998

Steve Slaten
RFCA Project Coordinator
Rocky Flats Environmental Technology Site
PO Box 928
Golden, CO 80402-0928

Re: B779 DOP Approval

Dear Steve:

The State has received and reviewed the Decommissioning Operations Plan (DOP) for the 779 Cluster Interim Measure/Interim Remedial Action, RF/RMRS-97-085.UN, dated February 1998. Pursuant to authority described in the Rocky Flats Cleanup Agreement (RFCA), sections 69 and 70, approval is granted to initiate and pursue decommissioning activities within the 779 cluster in accordance with plans and commitments as described within the DOP and with the stipulations outlined as follows:

- 1) Section 3.2 of the DOP indicates that initiation of any activities associated with this decommissioning project is contingent on completion of a "management review" [readiness assessment] of the projects infrastructure, procedures and personnel by DOE, CDPHE and the Integrating Contractor management. CDPHE sees this commitment of the DOP as essential and reminds RFETS that no activities are authorized without completion of these collaborative reviews.
- 2) Paragraph 60 of RFCA provides CDPHE authority to: a) "observe all activities performed pursuant to this agreement" b) "review records, files, and documents relevant to this agreement" and c) "ensure that work is performed properly and pursuant to EPA and CDPHE protocols, standards, regulations, and guidance, as well as pursuant to the Attachments [of RFCA] and approved decision documents..."

Be advised that CDPHE intends to carry out its regulatory responsibilities conscientiously through regular inspections of the decommissioning work.

- 3) Work authorized is as described within the DOP. In accordance with RFCA, any changes to work and scope beyond those described in the approved DOP must be authorized in accordance with provisions of Part 10 of RFCA. The CDPHE project coordinator may request or require field modifications to work in accordance with RFCA Paragraph 60(e).
- 4) By agreement, the demolition plan for the facility will be submitted to CDPHE later during the decommissioning process, after additional characterization data for the stripped-out building is available. No demolition activities, nor activities which breach the building shell are authorized without submittal, review and approval of the demolition plan by CDPHE. A combined management review will also be necessary prior to demolition. Final survey plans and independent verification details will also be required at this time. Be advised that public involvement on review of this sensitive step of the project will be required by the State. We recommend that the time for regulator and public review be factored into your scheduling and work planning for completion of the project.

ADMIN RECORD

B779-A-000168

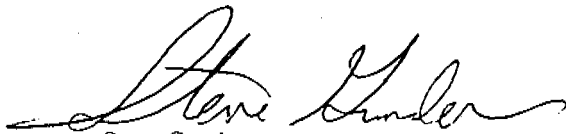
Steve Slaten
February 6, 1998
Page 2

- 5) The DOP includes a closure description document (CDD) for eight gloveboxes (RCRA Units 90.37, 90.39 and 90.43) located in Building 779, which the Site had been previously unable to decontaminate in order to meet the RCRA clean closure standard identified in Section X of the RFETS RCRA Permit. As a result, further decontamination of the gloveboxes was deferred to decommissioning. Submittal of a CDD was therefore necessary to provide the necessary information to complete RCRA closure for these gloveboxes. CDPHE's approval of the 779 DOP constitutes approval of the CDD for the RCRA Units 90.37, 90.39 and 90.43.

CDPHE, EPA and RFETS staff have worked collaboratively within the spirit of RFCA for almost 1 ½ years towards production of this first Decommissioning Operations Plan for a major plutonium building within the DOE complex. CDPHE believes that we have captured the necessary information, regulatory commitments and activity controls within the approved DOP so that the decommissioning of this first plutonium building can proceed safely without worker exposures and environmental releases. Although this document may likely serve as a base-template for future DOPs, we recognize that lessons may be learned during the implementation phase of the decommissioning which may indicate the need to augment or alter future DOPs.

Should you have any questions or regard clarification regarding this letter you may call Edd Kray at 966-2115.

Sincerely,



Steve Gunderson
RFCA Project Coordinator

cc:

Jessie Roberson, RFFO
John Whiting, KH
Mike Korenko SSOC
John Rampe, DOE
Paul Golan, DOE
Bob Card, KH
Fred Gerdeman, DOE
Tim Hedahl, KH
Alan Parker, KH
Mark Hickman, RMRS
Kathy Zbryk, RMRS
Mark Aguilar, EPA
Tim Rehder, EPA
Howard Roitman, CDPHE
Joan Sowinski, CDPHE
Bob Warther, DNFSB